



December 8, 2014

Environmental Management Support, Inc.
ATTN: Mrs. Edie Findeis Cromwell
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910
Phone: (301) 589-5318

Dear Mrs. Findeis Cromwell

On behalf of the City of Sterling, I am pleased to submit this Proposal for a \$400,000 Community-Wide Brownfields Assessment Grant. As a small community, we recognize the obstacle that brownfields create in our efforts to promote economic growth, environmental restoration, and social equity. We also realize that federal resources to invest in brownfields assessment, cleanup, and redevelopment initiatives are highly limited and must be targeted to communities that are the most committed to addressing brownfields and can demonstrate the greatest capacity for doing so. The City of Sterling is one of those communities.

The City of Sterling has a long history of a successful manufacturing industry, particularly the hardware industry. Unfortunately, the manufacturing industry that once supported the area has nearly failed, bringing the Sterling region significant state and national attention as the unemployment rate rose at one point to over 14% (US Census, 2010) and the region lost 11% of manufacturing jobs in the area (Illinois Department of Employment Security). Many companies were forced to shut their doors, and in turn, abandon their facilities. These facilities now sit vacant, causing blight throughout the City's downtown and along the riverfront. While the buildings are vacant, they still contain physical evidence of the operations that once flourished inside them. Huge machines still sit inside the buildings, as they did when the facilities were operational. Chlorinated solvents, zinc, chromium, nickel, asbestos, lead paint, and cyanide are expected to be the primary contaminants of concern on these sites, affecting those living and working near the buildings. In addition, with many of these buildings being located on the Rock River riverbank, we are particularly concerned about the contaminant impact to soil, groundwater, and surface water.

As the City of Sterling faces a bleak economic climate and an underutilized workforce, it has identified the redevelopment of brownfields as a key component to its economic recovery and future growth. The City of Sterling is targeting the downtown and riverfront sites as priorities

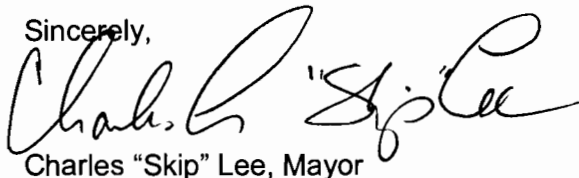
because these properties, situated along the Rock River, have the greatest redevelopment potential while also disproportionately impacting the health and welfare of minority and sensitive populations.

As mentioned previously, the City is serious about redeveloping these sites. For example, the City commissioned an Adaptive Reuse Plan for one of the City's priority sites, which illustrates that the City intends to redevelop the property into a mixed-use development that includes a boutique hotel, restaurants, specialty shops, housing, and a river walk. This assessment grant funding will help the City address this high-priority brownfields site that is negatively impacting the environment, the residents' health, and the City's image. By completing the assessment work described in this proposal, the City hopes to provide incentives for other businesses and residents to invest in the community by redeveloping its brownfield sites.

Applicant Identification:	City of Sterling, 212 Third Avenue, Sterling, Illinois 61081
DUNS Number:	034063404
Funding Request:	\$400,000 Community-Wide Assessment Grant (\$200,000 Hazardous Substances, \$200,000 Petroleum)
Location:	City of Sterling, Whiteside County, Illinois
Chief Executive:	Mr. Charles "Skip" Lee, Mayor 212 Third Avenue, Sterling, Illinois 61081 Phone: (815) 632-6622; Fax: (815) 632-6676 Email: slee@sterling-il.gov
Project Director:	Mr. Scott Shumard, City Manager 212 Third Avenue, Sterling, Illinois 61081 Phone: (815) 632-6621; Fax: (815) 632-6676 Email: sshumard@sterling-il.gov
Submittal Date:	December 19, 2014
Project Period:	October 1, 2015 – September 30, 2018
Population:	15,730 (US Census, 2010)

We hope that this application demonstrates the evident need for brownfields assessment funding in the City of Sterling, our commitment to this project, and the redevelopment plans that are in-place for the priority brownfield sites along the riverfront. We greatly appreciate your support and consideration for this US EPA Community-Wide Assessment Grant Proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles 'Skip' Lee". The signature is fluid and cursive, with the first name "Charles" and the last name "Lee" being more legible than the middle name "Skip" which is written in a stylized script.

Charles "Skip" Lee, Mayor

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RANKING CRITERIA:

1. COMMUNITY NEED:

a. Targeted Community & Brownfields; i. Targeted Community Description

The City of Sterling is a small, quintessential, Midwestern community located in northwest Illinois and situated along the Rock River. Formerly known as the “Hardware Capital of the World”, the City of Sterling has long been associated with the manufacturing and steel industries. The manufacturing industry, which has served as the City’s main economic driver for years, has nearly failed, bringing the City of Sterling and the surrounding region to its knees, even gaining state and national exposure as the City’s unemployment rate skyrocketed to over 14%¹ at one point. Companies were forced to shut their doors, and in turn, abandon their facilities. With the manufacturing industry’s downturn, the region where Sterling is located lost 11% of its manufacturing jobs². The loss of major industrial employers in the community left Sterling’s formerly industrial riverfront and downtown areas vacant and blighted, and its many community residents jobless. In addition, the City faces a large number of looming capital needs, straining their financial health situation and ability to address these environmental issues on their own.

As the City of Sterling faces a bleak economic climate and an underutilized workforce, it has identified the redevelopment of their downtown and riverfront properties as key components to its economic recovery and growth. Sterling’s historic past, including its old industrial core, waterfront, downtown, and oldest neighborhoods, are located within the target area in this application, which is also known as the Downtown Corridor. Even with its blight and perceived environmental issues, the Downtown Corridor offers locations for vital catalyst sites, Rock River access and the potential for some very unique open/green space amenities. As part of Sterling’s carefully crafted economic recovery plan, the City will use its Comprehensive Plan, Downtown Riverfront Redevelopment Plan, and Adaptive Reuse Studies as a basis to guide its brownfields redevelopment approach. **The redevelopment goals, established by the City’s aforementioned planning documents for the Downtown Corridor and the priority sites identified in this proposal include the following:** promote reinvestment and development/redevelopment along the riverfront; establish a unique character for the downtown and riverfront areas; promote job creation; implement sustainable growth management; enhance recreational opportunities; address contamination from potential brownfield sites that are directly impacting the health and safety of the City’s residents and bring these properties back to a more productive end-use.

The City of Sterling is seeking US EPA Community-Wide Assessment grant funds to characterize the environmental contamination of, and to develop plans for, the former industrial and commercial brownfield properties within the Downtown Corridor, with special emphasis on the riverfront properties. The gateway into the City of Sterling is the Illinois State Route 40 Bridge. As you cross the bridge, instead of seeing a flourishing riverfront and downtown, the first thing visitors to the City see are two massive, abandoned hardware factory buildings. This is not exactly a welcome site. One of those buildings is the former National Lock Factory and the other is the former Lawrence Brothers site, both of which are located in the Downtown Corridor target area of this Assessment Grant application. Lawrence Brothers and the National Lock Factory were once bedrocks of the community. Now these massive buildings sit unused with huge machines still inside the buildings exactly as they were when the facilities were still in operation. Taking up multiple acres of land with their numerous buildings that amass over half a million square feet together, these sites sit directly on the edge of the Rock River. There is no bank between the building exteriors and the water. Chlorinated solvents, zinc, chromium, nickel, asbestos, lead-based paint, and cyanide are expected to be the primary contaminants of concern on these priority sites, affecting those living and working near the building. In addition, with these two priority sites being located on the Rock River’s banks, the City is particularly concerned about the contaminant impacts to soil, groundwater, and river water.

ii. Demographic Information

Table 1 shows basic demographic data for the Downtown Corridor and the City as a whole

¹ Source: US Census Data, 2010

² Source: Illinois Department of Employment Security, 2010

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Table 1: Demographic Data

	City of Sterling	Downtown Corridor	Illinois	National
Population ¹	15,370	9,226	12,830,632	308,745,538
Unemployment ²	6.6%	9.5%	10.1%	9.6%
Poverty Rate ¹	14.7%	15.5%	13.3%	14.3%
Percent Minority ¹	17.5%	17.04%	28.5%	26.7%
Per Capita Income ¹	\$20,010	\$20,215	\$28,469	\$26,530
Median Household Income ¹	\$37,566	\$40,787	\$53,974	\$50,221
¹ Data is from 2010 US Census data and is available at: http://www.census.gov/ ² Data is from the Bureau of Labor Statistics October 2014 and is available at www.bls.gov/ ; Downtown Corridor is comprised of 2 Census Tracts				

iii. Brownfields

Founded in 1857 on the bank of the Rock River, much of the early life of the City of Sterling centered about the River. Sterling was once referred to as the "Hardware Capital of the World", at one time being home to Northwestern Steel and Wire, R. B. and W. Bolt and Nut Company, Lawrence Brothers, National Manufacturing Company, Frantz Manufacturing Company, Charter Wire Products Company, and Wilburt Vault Company. Unfortunately, the City's economy has been in a steady state of decline and has lost a majority of the manufacturing sector that once made this City great. Along with the significant loss of jobs, the population has declined and poverty rates have continued to climb. This has all resulted in an abundance of abandoned, vacant, and potentially contaminated properties, such as the former Lawrence Brothers site. The City of Sterling is experiencing great difficulty coming up with financing on their own to address these brownfield properties, and is facing a consistent decrease in state and federal funds available to address them. Sterling's rich industrial heritage has left a legacy of numerous abandoned buildings on contaminated property, surrounded by low-income neighborhoods, as well as the Rock River. The Rock River, while an important feature in defining the character of the City, is not a celebrated or well-used feature of the community. Despite having several handsome, historic buildings and bridges, much of the riverfront has a raw, unkempt appearance due to the City's industrial history and is lined by declining and defunct industrial facilities. Debris has collected along the riverbanks. There is a significant amount of underutilized land along the river. With few exceptions, the entrance to the riverfront lacks a sense of entry or arrival to the City. Moreover, the lack of public space (greenways/recreational space) along the river downplays one of the City's most remarkable natural resources - the Rock River.

The vacant industrial and manufacturing parcels within the Downtown Corridor area contain aging, deteriorating buildings, and the removal and/or preferably rehabilitation of these sites will need to occur prior to redevelopment. The harmful effect that these brownfield sites have on the population of Sterling is profound. Despite significant success with the City's Brownfields Program to date, difficult sites remain, depressing the Downtown and the Riverfront areas. These brownfield sites impact the City and communities in several ways. First, they are a blighting influence on the Downtown Corridor, in particular the Riverfront. Often magnets for illegal dumping or other crimes, these brownfield sites bring down the property values and the overall morale of the community, further contributing to a downward spiral of decline. Second, these sites are abandoned, and thus they cost taxpayer money to maintain while simultaneously not generating any taxes to contribute to the City. Finally, the contamination on these sites is a potential threat to not only to human health but also to the environment. While the City keeps these vacant sites locked and secure, vandalism still happens. In 2013, local youths got into the former Lawrence Building site and set a fire. With the building still housing drums of contaminants and other chemicals, the Illinois Environmental Protection Agency's Office of Site Evaluation was called to Sterling to perform a "Time Critical Removal Action" at the site. Luckily, this incident was contained fairly quickly, but it illustrates the direct threat to the health and safety of the City's residents. The "Time Critical Removal Action" does not affect the former Lawrence Building's brownfields eligibility. As a component of the hardware manufacturing industry, metal plating was also conducted on the priority sites for years at various locations throughout the buildings in the Downtown Corridor. Chlorinated

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solvents, zinc, chromium, nickel, asbestos, lead-based paint, and cyanide are expected to be the primary contaminants of concern, but others could certainly exist. The anticipated contaminants and health effects that would be expected to be present from the manufacturing activities performed at the priority sites are provided in Table 2 below:

Table 2: Expected Contaminants & Subsequent Health Effects in Sterling Brownfield Sites

Expected Contaminant	Contaminant Health Effect³
Tetrachloroethene	Affected Organ Systems: Developmental, Neurological and Respiratory. Cancer Effects: Reasonably anticipated to be a human carcinogen.
Trichloroethene	Affected Organ Systems: Developmental and Neurological. Cancer Effects: Reasonably anticipated to be a human carcinogen.
Chromium	Affected Organ Systems: Immunological, Renal, and Respiratory. Cancer Effects: Known to be a human carcinogen.
Zinc	Affected Organ Systems: Gastrointestinal, Hematological and Respiratory. Cancer Effects: None known.
Nickel	Affected Organ Systems: Cardiovascular, Dermal, Immunological and Respiratory. Cancer Effects: Reasonably anticipated to be a human carcinogen
Cyanide	Affected Organ Systems: Dermal, Neurological and Reproductive. Cancer Effects: None known.
Lead	Affected Organ Systems: Cardiovascular, Developmental, Gastrointestinal, Hematological, Musculoskeletal, Neurological, Ocular, Renal, and Reproductive. Cancer Effects: None Known.
Asbestos	Affected Organ Systems: Respiratory. Cancer Effects: Known to be a human carcinogen.
Petroleum	Affected Organ Systems: Cardiovascular, Developmental, Neurological, Ocular, and Hematological. Cancer Effects: Known to be a human carcinogen

The expected contaminants listed above represent what's present in the priority sites in the Downtown Corridor and are typical of the types of other sites found in the City of Sterling. The threat of human exposure to these contaminants via direct contact, ingestion and inhalation of particulates and vapors, is intensified by the fact that the sites in the Downtown Corridor are located in close proximity to residences, schools, parks, and the Rock River. The priority sites located within the Downtown Corridor are also located on the shore of the Rock River, making the river highly susceptible to impacts contaminants. Metals contamination, in particular, can migrate long distances in the subsurface and could have a negative impact on the river that would exceed established surface water quality criteria. Reportedly, a water well exists on the former Lawrence Brothers site that is 1,646 feet deep and was once used for process water. If solvent or metal contamination is present on the former Lawrence Brothers site, impacts to the water well is probable. Old water wells are not typically sealed (grouted), allowing contamination to migrate down the side of the casing to the deep aquifer below. The site's location along the Rock River indicates that a larger amount of sand and gravel alluvium is present that could also allow for easy migration of contaminants from the site.

iv. Cumulative Environmental Issues

In addition to the perceived contamination due to the manufacturing activities performed at sites within the Downtown Corridor, these locations are also a hot spot for illegal dumping due to their vacancy and blight. For several decades, dumping of untreated waste water was occurring, especially at night. This illegal dumping led to at least one arrest. The surrounding residential neighborhoods and the Rock River were susceptible to this contamination as well. According to US EPA's EJView⁴, the City of Sterling has over 30 Air Emissions sites (AFS), over 25 Water Dischargers (PCS/ICIS), and dozens of facilities that have Toxic Releases (TRI). There are also dozens of active air discharge permits in the City. Each of

³ Source: Agency for Toxic Substances and Disease Registry

⁴ <http://epamap14.epa.gov/ejmap/ejmap>

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these environmental issues occur heavily in the targeted Downtown Corridor. In addition, Sterling has sections of the City, including the Downtown Corridor, that have been designated as “food deserts” by USDA⁵. A “food desert” is an urban neighborhood or rural town without ready access to fresh, healthy, and affordable food. Instead of supermarkets or grocery stores, these neighborhoods are inundated with fast food and convenience store options for food, which leads to a poor diet, further leading to increased obesity, diabetes, and heart disease in the City’s residents.

b. Impacts on Targeted Community

As indicated in Table 1, low-income residents, people in poverty, and minorities live in greater percentages in the target neighborhood than elsewhere in the City. These sensitive populations are thus disproportionately impacted by the large number of unaddressed brownfield sites in the Downtown Corridor. The City of Sterling is home to many sensitive populations, including children, senior citizens over the age of 65, minorities, and women of child-bearing age. According to the 2010 US Census, 27.9% of Sterling’s population is children under the age of 18 years old, with 8% of them being ages 0-5. Women of child-bearing age make up 31.2% of the City’s population, and 16.5% of the population are made up of senior citizens over the age of 65. Further, the City of Sterling has a significant Hispanic population (the majority of who speak only Spanish), making up 17.5% of the City’s population. These statistics are even more dire in the Downtown Corridor, with 27% of the Hispanic population and 19.51% of the African American population living in poverty there. In addition, 10.5% of the population in the City’s Downtown Corridor are disabled in some capacity. By utilizing US EPA’s online EJView (Environmental Justice View) program, we are able to identify potential Environmental Justice areas in our community. For instance, EJView shows that the neighborhood directly surrounding the former Lawrence Brothers site, which has been identified as a priority site for the City, has a 37% minority population, a poverty rate at 13%, and that the neighborhood has a 25% higher cancer risk than other areas of the City. It’s evident that the former Lawrence Brothers site is a direct health and safety threat to the sensitive populations immediately surrounding the proposed project site. The types of site contaminants associated with the priority sites listed in Table 2 are known carcinogens, and the suite of other health effects associated with chronic exposure to the listed contaminants include respiratory problems, developmental delay, central nervous system effects, and reproductive system effects⁶. Residents within close proximity to the priority sites in the Downtown Corridor are potentially exposed to site soil contaminants through dermal contact, ingestion and inhalation of particulates and vapors.

c. Financial Need

i. Economic Conditions

The City of Sterling does not have adequate resources to tackle the vital assessment work described in this proposal without support. The economic impact of brownfields on the City of Sterling is pervasive and adversely affects employment, investment, and property values in the City. The significant decline in manufacturing throughout the area is heavily felt in the City of Sterling. Recent examples include the closure of the Northwestern Steel and Wire facility, resulting in the loss of 1,400 jobs, as well as the closure of the General Electric Plant and the Tyco-Penberthy facility, resulting in the loss of nearly 200 jobs. From December 2007 to June 2009, the Sterling/Whiteside County region recorded a loss of 1,089 total jobs (NIU Center for Governmental Studies), and most of these jobs have not been recovered. Unemployment rates in Whiteside County, where Sterling is located, have steadily been higher than the national average and are much slower to recover. The City of Sterling’s unemployment rate is higher than the current state and national averages. As mentioned previously in this section, Sterling faces a large number of looming capital needs, straining their financial health situation and ability to address these environmental issues on their own. The City of Sterling is located in a federally designated Empowerment/Enterprise Community. The Department of Housing & Urban Development created Empowerment/Enterprise communities with the intention to reduce unemployment and generate economic growth through the designation of Federal tax incentives and award of grants to distressed communities. This designation further illustrates the City of Sterling’s economic struggle.

⁵ USDA’s “Access to Affordable and Nutritious Food: Updated Estimates to Distance of Supermarkets Using 2010 Data.

⁶ Source: Center for Disease Control ATSDR ToxFAQ sheets

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Entrepreneurship and small business growth are often at the heart of rural economies, as larger employers are relatively few in number. This is worrisome in the City of Sterling because there is a low rate of business startups in the region at 2.4%, compared to a proportionately high closure rate of 8.1%. While the area has a business closure rate lower than the U.S. average, the closure rate is nearly four times the startup rate (NIU Center for Governmental Studies). This can lead to workers commuting longer distances to work and purchasing goods and services elsewhere, which diminishes the markets for stores in the City of Sterling. The City needs to create conditions that encourage local entrepreneurs and small business owners to establish and grow in the region. The City of Sterling's Brownfields Program can help with this issue by providing the catalytic funding for the assessment of brownfield sites within the Downtown Corridor.

ii. Economic Effects of Brownfields

Left unaddressed, brownfield sites contribute to prolonged disinvestment, causing those that can afford to relocate to flee from the community. This results in a shrinking tax base and a disappearance of quality goods, services, and employment opportunities. These blighted areas become an eyesore to the community and degrade both the individual and community spirit of the residents living amongst such deterioration. The depressing economic and financial effect that brownfield sites have on the City of Sterling is clearly seen from economic statistics generated by the 2010 US Census. The demographic profile provided in the table on Page 2 of this Proposal illustrates the City of Sterling's current economic state. For example, Sterling is plagued with an alarming poverty rate of 14.7%, but that figure is even higher at 15.5% for those living in poverty in the Downtown Corridor. In addition, according to the Bureau of Labor Statistics, the City of Sterling suffers an unemployment rate of 9.5%. As would be expected, Sterling's per capita and median household incomes are a fraction of the National, State, and County averages, at \$20,010 and \$37,566 respectively. This is also true for the affected neighborhood surrounding the former Lawrence Brothers site. According to the 2010 US Census data the City of Sterling has one of the lowest Median Household Incomes in the State of Illinois. The average household income in the City is 80% of the state and national averages. Brownfields are certainly not the sole cause of impoverishment and unemployment; however, their heavy concentration in the Downtown Corridor complicates the ways in which these problems can be solved. The acres upon acres of vacant industrial brownfield land in the Downtown Corridor represent a lost opportunity to generate taxes for the City. Without assessment and cleanup, these sites also represent lost opportunities for job development and economic diversification. In addition, these sites hinder the expansion of housing opportunities, particularly for the low-income population.

2. PROJECT DESCRIPTION & FEASIBILITY OF SUCCESS:

a. Project Description

i. Project Description

The objective of Sterling's brownfields assessment program is to identify and prioritize hazardous substance and petroleum sites, perform Phase I and Phase II assessments, and plan for site remediation, with an emphasis on furthering its revitalization efforts within the Downtown Corridor, particularly the riverfront priority sites identified in this proposal. After addressing the priority sites identified in this proposal, all potential brownfield sites for assessment will be re-prioritized based on location, accessibility, redevelopment potential, consistency with long range plans and known/suspected environmental issues. Remediation planning will then be initiated for sites with identified contamination. If awarded, the City anticipates spending approximately 70% of the Task 4 (Phase I & II Environmental Site Assessments) funds on priority sites (which have already been discussed at length) that are impacting sensitive populations and those with a high redevelopment potential; 20% to proactively assess additional sites where residents' exposure to contaminants and/or migration of contaminants to natural resources is of concern; and 10% for the assessment of other sites where development and/or business interest occurs during the project. Once a site is selected for assessment, the City will submit an eligibility determination to the US EPA and/or the Illinois EPA. Upon securing approval of site eligibility, the community will be notified, a Property Profile for the site will be created in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database, and the site will be evaluated through the performance of Phase I and Phase II Environmental Site Assessments. All Phase I Environmental Site

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Assessments will be conducted according to the requirements of All Appropriate Inquiry (ASTM Standard E1527-13) to identify Recognized Environmental Conditions that may indicate the presence of contamination. The environmental consultant will design a Phase II Environmental Site Assessment in general accordance with ASTM Standard E1903-11 and, as applicable, the Illinois EPA's voluntary cleanup program, known as the Site Remediation Program, to investigate the areas of potential environmental impact. Green site investigation and cleanup techniques will be encouraged. ASTM's recently developed Standard Guide for Green Cleanups (E2893-13) will serve as the foundation of the investigation activities. The guide focuses on incorporating greener Best Management Practices into site assessments and cleanups with the overall goal of reducing the environmental footprint during all phases. The overall assessment goals will be to evaluate the environmental liabilities, secure the site if threats exist, evaluate and minimize potential off-site impacts, and gauge redevelopment issues associated with on-site contamination. A Quality Assurance Project Plan (QAPP), Sampling and Analysis Plan (SAP), and a Health and Safety Plan (HASP) will be submitted to US EPA for review. Upon approval, the environmental consultant will conduct a Phase II Environmental Site Assessment to collect media samples (soil/groundwater/asbestos) for laboratory analysis. Upon receipt of the laboratory results, the environmental consultant will work with the City, potential developers, and/or community partners to devise liability management, cleanup, and site re-use strategies that support the City's redevelopment efforts stated in their planning documents and that will improve the health of the residents and the environment. After completion of initial assessment, additional safe use or remedial investigations may be needed to further define the nature and extent of the contamination, as well as design environmental response actions for cleanup and safe future use of the site. Depending on liability concerns and redevelopment goals, contaminated sites may be entered into the Illinois EPA's voluntary cleanup program or the States' Leaking Underground Storage Tank Program. The results of any assessments will be disseminated to the community through public meetings, fact sheets, social media, and notification from our Community Partners. If health threats are identified, the Illinois EPA and the Whiteside County Health Department will be notified along with the City's US EPA Project Manager. If needed, the City of Sterling will seek additional funding from local and state agencies, as well as additional US EPA Brownfield Assessment and Cleanup Grants and Revolving Loan Funds for additional assessment activities and subsequent environmental response actions.

ii. Project Timing

Table 4: Project Schedule – October 1, 2015 through September 30, 2018

Project Activity	Completion Date	Responsibility Party
Hire Environmental Consultant	October 2015	City of Sterling
Convene BRAC to review inventory and confirm/revise priorities	January 2016	City of Sterling
Site Eligibility Determination Submissions	January 2016 and Ongoing	City of Sterling/Environmental Consultant
Quarterly Reporting, Annual Reporting, GIS Updates, ACRES Database Updates	Ongoing	City of Sterling/Environmental Consultant
Fact Sheets, Website Updates, Press Releases, Meeting Minutes, Social Media Updates	Ongoing	City of Sterling
Phase I Environmental Site Assessment Activities	February 2016 and Ongoing	Environmental Consultant
Sampling & Analysis Plan Submissions	February 2016 and Ongoing	Environmental Consultant
Health & Safety Plan Submissions	February 2016 and Ongoing	Environmental Consultant
Quality Assurance Project Plan Submission	March 2016 and Ongoing	Environmental Consultant

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Phase II Environmental Site Assessment Activities	June 2016 and Ongoing	Environmental Consultant
Remedial Action Plan Submittal	June 2016 and Ongoing	Environmental Consultant
Analysis of Brownfields Cleanup Alternatives Submission	June 2016 and Ongoing	Environmental Consultant
Evaluation of Institutional and Engineering Controls	To Be Determined Per Project	Environmental Consultant

iii. Site Selection

The City of Sterling has created an initial Brownfields inventory with their own resources, recognizing at least 25 potential brownfield sites. The City will work with their community partners, their environmental consultant, their Brownfields Redevelopment Advisory Committee (BRAC), and their staff to prioritize sites based on redevelopment potential and the environmental conditions. The environmental conditions will be determined by the City's environmental consultant, while the redevelopment potential component will be determined with the help of the City's BRAC and their community partners. The City will develop a ranking system that allows them to utilize grant funds on their best positioned sites. As discussed in detail in previous sections, the City has priority sites already in-place. Based upon the City's previous Brownfields activities, they do not foresee any access issues. If necessary, a written access agreement will be obtained from the property owners. No property owner will be coerced into participation in the City's Brownfields assessment activities and the City will openly communicate the intent of their program to the targeted neighborhoods, as they have done to date. Any access issues will also be communicated with US EPA.

b. Task Description and Budget Table

i. Task Description

Task 1 - Programmatic Costs: The budget includes programmatic costs of \$10,500 for each Hazardous Substances and Petroleum assessment grant funds. The City's personnel costs (\$2,500 Hazardous Substances/\$2,500 Petroleum) along with the consultant's contractual costs will cover the preparation and submittal of quarterly and annual reports, as well as the maintenance of Brownfields information within the City's GIS System. The contractual costs included in the budget (\$5,000 Hazardous Substances/\$5,000 Petroleum) will allow for the chosen qualified environmental consultant to coordinate with US EPA on the project, document the Brownfields site selection process, coordinate/conduct operational meetings, and other grant inventory/assessment activities. The City's travel costs, \$3,000 for each Hazardous Substances and Petroleum budget will allow for two City representatives to attend two US EPA National Brownfields Conferences or other State or private brownfields related conferences or work sessions. The anticipated costs for attending the National Brownfields Conference are as follows: Airfare: \$1,250 Haz/\$1,250 Pet; Lodging: \$1,000 Haz/ \$1,000 Pet, Meal Per Diems of \$500 Haz/ \$500 Pet; and Ground Transportation/Parking at \$250 Haz/ \$250 Pet. **Outputs** for this task include quarterly reports, annual financial reports, disadvantaged business enterprise reports, meeting minutes, ACREs updates, and GIS data files.

Task 2 - Community Outreach: The City will continue to encourage and facilitate community involvement in the development of the strategic plan for reuse of the identified brownfield properties. Because Brownfields Projects are partnerships between the private and public sectors, industrial, financial and community representatives will benefit from the collaborative planning regarding potential investment and development opportunities. These costs include a total of \$7,500 for each Hazardous Substance and Petroleum budget that will be used to conduct community involvement and outreach programs and meetings. The cost will be split between City personnel and contractual costs (\$3,750 each) and will include preparing, printing, and mailing project information and marketing documents, press releases, developing and updating fact sheets, and maintaining outreach to citizens through social media and our website. The City will work with their community partners to ensure that the public remains informed and involved. **Outputs** for this task include marketing documents, press releases, fact sheets, social media and website posts.

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Task 3 - Site Prioritization: The City will need to update their existing Brownfields inventory to ensure that its accuracy and to prepare for re-prioritization. The budget estimates include inventory maintenance and prioritization costs of \$5,000 for each Hazardous Substances and Petroleum budget. This component will be completed by City Staff and their Environmental Consultant. The City will work with their community partners, consultant, and their staff to prioritize the sites based on redevelopment potential and the specific environmental condition. The environmental condition will be determined by their consultant, while the redevelopment potential component will be determined with the help of the City's community partners and Brownfields Redevelopment Advisory Committee. The City will develop a ranking system that will allow them to best utilize grant funds on the selected sites. **Outputs** for this task include a brownfields inventory and prioritizations and Brownfields Redevelopment Advisory Committee meeting minutes.

Task 4 - Site Assessment: Based on site inventory rankings and community needs, selected sites will be evaluated through Phase I and Phase II Environmental Site Assessments. The assessments will be conducted in compliance with the requirements of All Appropriate Inquiry as well as applicable ASTM standards and practices. This task includes budget estimates of \$145,000 for each Hazardous Substance and Petroleum budget. The costs for completing Phase I and Phase II Environmental Site Assessments can vary depending on the complexity of the sites. Based on past grant funded assessments, it is anticipated that Phase I Environmental Site Assessment costs will range from \$2,500 - \$5,000 and Phase II Environmental Site Assessment costs between \$15,000 to \$30,000, per site. The City anticipates that approximately 12 sites will experience Phase I Environmental Site Assessments at an average cost of \$3,750. The proposed budget includes \$22,500 for Phase I Environmental Site Assessment activities for each Hazardous Substances and Petroleum budget. The City anticipates conducting at least 5 to 7 Phase II Environmental Site Assessments at sites to supplement the Phase I Environmental Site Assessments where Recognized Environmental Conditions were identified. Since the City is anticipating conducting up to 7 Phase II Environmental Site Assessments at an expected cost of up to \$30,000 per site, a total Phase II budget of approximately \$210,000 (\$105,000 each for Hazardous Substances and Petroleum budget) is proposed. The assessments will determine the contaminants present, contaminant levels, and the presence of any immediate threats. The results of the Phase II Environmental Site Assessments work will be compared to Illinois EPA's Tiered Approach to Corrective Action Objectives (TACO) to evaluate contaminants through human exposure pathways. If contamination is identified, the City will seek to enroll the impacted sites in the Illinois EPA's voluntary cleanup program for further investigation and remedial planning. The City anticipates the enrollment of four to six sites into the voluntary cleanup program. The City is budgeting \$15,000 for each Hazardous Substances and Petroleum budgets to cover the costs of the enrollment and Illinois EPA Project Manager review fees. Health and Safety and Sampling Analysis Plans will be prepared for all Phase II Environmental Site Assessment activities, and the costs of which have been configured into the total budget costs for Phase II Environmental Site Assessments. A Quality Assurance Project Plan will also be prepared by the contracted Brownfields consultant in accordance with the US EPA's guidelines. For this, the City has allocated \$2,500 in contractual fees from both the hazardous substances and petroleum budgets. **Outputs** for this take include Phase I and Phase II Environmental Assessment Reports, a project Quality Assurance Project Plan, site-specific QAPP updates, Health and Safety Plans, and Sampling & Analysis Plans.

Task 5 - Cleanup Planning: The City will conduct cleanup and redevelopment planning as required by the Illinois Brownfields Program, Illinois EPA's voluntary cleanup program, and the Leaking Underground Storage Tank program for Brownfields sites where redevelopment is imminent, budgeting \$32,000 for each Hazardous Substances and Petroleum budget for these activities. This task will include the preparation of Remedial Action Plans, assessment of Brownfields cleanup and redevelopment alternatives, and the evaluation of institutional and engineering controls. Contractual costs for this task are estimated at \$22,000 for each Hazardous Substances and Petroleum budget. These costs are based on completing 2 Hazardous Substances and 2 Petroleum Remedial Action Plans at \$11,000 each. This task also includes \$5,000 each for the Illinois EPA's project management oversight fees associated with

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the voluntary clean-up program. **Outputs** for this task include Remedial Action Plans and Site Remediation Program/Leaking Underground Storage Tank program enrollment and review documents.

ii. Budget Table

COMMUNITY-WIDE HAZARDOUS SUBSTANCES PROJECT TASKS						
BUDGET CATEGORIES	Task 1: Programmatic Costs	Task 2: Community Outreach	Task 3: Site Prioritization	Task 4: Phase I and II Site Assessments	Task 5: Cleanup Planning	Total
Personnel	\$2,500	\$3,750				\$6,250
Travel	\$3,000					\$3,000
Equipment						
Supplies						
Contractual	\$5,000	\$3,750	\$5,000	\$130,000	\$22,000	\$165,750
IL EPA Fees				\$15,000	\$10,000	\$25,000
Project Total	\$10,500	\$7,500	\$5,000	\$145,000	\$32,000	\$200,000
COMMUNITY-WIDE PETROLEUM PROJECT TASKS						
BUDGET CATEGORIES	Task 1: Programmatic Costs	Task 2: Community Outreach	Task 3: Site Prioritization	Task 4: Phase I and II Site Assessments	Task 5: Cleanup Planning	Total
Personnel	\$2,500	\$3,750				\$6,250
Travel	\$3,000					\$3,000
Equipment						
Supplies						
Contractual	\$5,000	\$3,750	\$5,000	\$130,000	\$22,000	\$165,750
IL EPA Fees				\$15,000	\$10,000	\$25,000
Project Total	\$10,500	\$7,500	\$5,000	\$145,000	\$32,000	\$200,000

c. Ability to Leverage

While the City of Sterling is requesting \$400,000 in Assessment Grant funds, due to the sheer size of some of the buildings in the Downtown Corridor, it is anticipated that the assessment costs will far exceed \$400,000. The City of Sterling has partnered with the Illinois Environmental Protection Agency's Office of Site Evaluation to assist with the additional necessary assessment activities. Their firm letter of commitment of is attached to this Proposal in Attachment 5. With this additional funding, the will be able to complete this vital assessment work. The requested grant funds represent a single funding tool. The City of Sterling has been extremely successful in leveraging funds to complete brownfields assessment, remediation, and redevelopment at sites other sites in the City. The City of Sterling has leveraged over \$1,000,000 in funding for brownfields assessments, investigations, and cleanups since receiving their first grant in 2003. The City of Sterling is a federally designated Empowerment/Enterprise Community, allowing the City various latitudes in offering incentives to businesses that want to locate in the City, particularly on brownfield sites. The City's Community Partners' assistance will be vital in locating and securing multiple funding resources and incentives to complete the planned redevelopment work in the Downtown Corridor. As they have been in the past, the City of Sterling is planning to be just as successful at leveraging funds for their priority sites within the Downtown Corridor. For example,

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based on the financial strategy laid out in the Adaptive Reuse Plan for the former Lawrence Brothers site, approximately \$12 million is needed to achieve the full redevelopment plan. When the site officially closed in 2006, the Equalized Assessed Value of the property was just \$38,093. Based on the Adaptive Reuse Plan, the EAV of the fully redeveloped site is estimated to be at \$3,078,919. This would generate a substantial increment that could be used in the project. The financing for the redevelopment of this project will come in the form of private investment and equity, as well as through various private/public funding sources including: the municipal budget, Illinois Environmental Protection Agency's Municipal Brownfield Funding Program, EPA Revolving Loan Fund and Cleanup Grants, TIF and Enterprise Zones within the City, New Market Tax Credits, CDBG funding, DNR recreation funding, private developer contributions, tax incentives, in-kind contributions, technical assistance, and federal grants. Federal and State Historic Tax Credits will be pursued for this specific project that could generate approximately \$9.1 million in funding. It's vital to note that none of the above leveraged funds will be available for access until the full environmental condition of the property is known, which is why this assessment grant funding is so necessary to obtain.

3. COMMUNITY ENGAGEMENT & PARTNERSHIPS:

a. Plan for Involving Targeted Community/Stakeholders; Communicating Project Progress

i. Community Involvement Plan

The City of Sterling has been engaging its residents and stakeholders in their Brownfields Program since its inception in 2003. The City has maintained this community engagement over the last decade by reconvening their Brownfields Redevelopment Advisory Committee and being very open and transparent about their pursuit of additional brownfields funding as well. These communication efforts by the City has brought together residents, visionaries, community groups, government entities, and private and nonprofit organizations to marshal financial and intellectual resources to forward the causes of economic development, recreation, tourism, habitat, transportation, and cleanup within the Downtown Corridor. The City made their pursuit of more recent Brownfields funding public in the summer of 2011. When the 2011 submittal, and the subsequent proposals, were not funded, the City maintained their open communication with the community. The City of Sterling will continue to include the affected neighborhoods and their respective residents, property owners, and business owners as vital partners in our assessment, cleanup, and/or reuse plans by holding public meetings and asking for input on site prioritization and redevelopment planning efforts. Neighborhood organizations and citizen's groups will have the opportunity to express their concerns, identify their needs, and create and implement redevelopment plans. If these grants funds are awarded, we will hold a two-week public comment period on our draft work plan and announce the availability of the plan through a press release to local media. The City of Sterling has partnered with the Greater Sterling Development Corporation, Sterling Main Street, and the Sterling Park District to assist with community notification efforts through their respective organizations. For any cleanup planning activities funded by this grant, the City will seek the community's input into cleanup and redevelopment decisions by presenting information regarding the proposed cleanup and reuse plans at one or more community meetings in collaboration with their appropriate Community Partners. Due to the City's heavy Hispanic population, translation services are available through the City and via social media postings, so we will accommodate any non-English speaking residents/stakeholders, etc. when it is appropriate.

ii. Communicating Progress

As the City moves forward with the planned assessment activities, the City will develop fact sheets on the status of brownfields assessment activities at important junctures. They will post these fact sheets on their webpage, at City Hall, and will utilize any necessary social media to notify the public of any activity with a direct link to the City's webpage. Once the Brownfield Assessment activities commence, the City will be sure to remain in regular, transparent communication with their residents and stakeholders. Since our proposal is community-wide, the focus of our notification program will be on the City as a whole, but with particular emphasis on the Downtown Corridor. The appropriate notification methods that Sterling will utilize include newspaper articles, web publishing/posting, social media postings, and City Council meetings. In addition, our Community Partners will play vital roles in the community outreach

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efforts, directly notifying their organizations as well as other civic and social groups to ensure the widest reach. If the City is awarded this grant funding, they will continue with the utilization of diverse notification methods to ensure that they reach a broad audience. The City of Sterling has a significant Hispanic population, so the City will need to translate the community notification information into Spanish. In addition, the City of Sterling will seek out translation services for any households directly impacted by any assessment work. For any cleanup planning activities funded by this grant, the City will seek the community's input into cleanup and reuse decisions by presenting information regarding the proposed cleanup and reuse plans at community meetings in collaboration with their Community Partners.

b. Partnerships with Government Agencies

i. Local/State/Tribal Environmental Authority

Brownfields redevelopment is inherently challenging. Consequently, the City of Sterling recognizes that they can bolster their success rate in facilitating redevelopment by drawing on the different areas of expertise of their local, regional, state, and federal partners. Sterling has successful partnerships already in place and they will seek to develop others as they continue to advance to the next phases of their Brownfields Program. The Illinois Environmental Protection Agency's Office of Site Evaluation will be heavily involved in the assessment activities of the priority projects located in the Downtown Corridor, serving as a vital partner by providing technical expertise and leveraged resources to complete the proposed assessment activities. The Illinois EPA will be a vital partner in overseeing the environmental assessment, and ultimate cleanup, of the Downtown Corridor through their Site Remediation Program and eventually their voluntary Cleanup Program. Sterling's goal is to obtain a No Further Remediation (NFR) letter to facilitate the adaptive reuse plans of the Downtown Corridor in alignment with their Downtown Riverfront Redevelopment Plan. Sterling will continue to develop close working relationships with both the Whiteside County Health Department and the Illinois Department of Public Health if their assessment findings warrant their services. As described in Table 2, the potential contaminants that concern the City based upon historic use at the priority sites are chlorinated solvents, zinc, chromium, nickel, asbestos, lead paint, and cyanide. Based on the list of expected contaminants, the City will carefully consider potential health risks to their residents. If these specific contaminants are identified through assessment activities, the City will share their data with both the Whiteside County Health Department and the Illinois Department of Public Health's respective health officials to discuss human health and environmental concerns.

ii. Other Relevant Governmental Partnerships

The City of Sterling recognizes and understands that brownfield redevelopment projects require a cooperative effort among City, County, State (IEPA), and Federal governments (US EPA), the business community, citizen groups, and environmental/technical professionals. As explained previously, the City does not have the adequate financial resources to deal with these sites on their own, so it's by necessity that Sterling develops relationships with their partners to maximize and leverage additional resources for these important projects. Sterling will continue to be aggressive in seeking funding from various State and Federal agencies to bring brownfields redevelopment projects to fruition. Examples of those agencies include: the State and Federal Departments of Transportation, the State and Federal Environmental Protection Agency, the Illinois Department of Natural Resources, the State and Federal Economic Development Agencies, and the Illinois Department of Commerce & Economic Opportunity. The Illinois Department of Natural Resources will also serve as a valuable resource in protecting the City's open lands and precious natural resources, which will only enhance the residents' quality of life.

c. Partnerships with Community Organizations

The City of Sterling has partnered with four community organizations that will serve vital, meaningful roles in their Brownfields Program, as these groups are the key to accomplishing the work proposed for this grant:

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i. Community Organization Description & Role

- **Sterling Main Street:** Sterling Main Street unites individuals, organizations, businesses, and local government to support a revitalized, historic downtown **Role:** utilize their four-point approach to downtown revitalization (organization, design, promotion, and economic restructuring) to help the City re-invigorate downtown development. Sterling Main Street will also serve as vital component of the City's Brownfields Redevelopment Advisory Committee
- **Greater Sterling Development Corporation:** The Greater Sterling Development Corporation was created to coordinate and streamline economic development efforts in Sterling. **Role:** help the City leverage their financial resources to provide redevelopment incentives to new and existing businesses that will utilize these brownfield sites, with special emphasis on the development of riverfront properties
- **Sterling Park District:** The Sterling Park District works to enrich the community and its economic viability by providing outstanding parks, programs, facilities, and recreational opportunities. **Role:** provide a continued focus on sustainability for the City, working to help create more greenspace and recreational opportunities as an end-use for redeveloped brownfield sites, with particular emphasis on the downtown and along the riverfront properties. In addition, the Sterling Park District will do its part to assist the City with the maintenance
- **Blackhawk Hills Regional Council:** The mission of Blackhawk Hills Regional Council is to assist the people and local agencies of northwest Illinois in developing and implementing a regional outlook that will enhance economic growth, workforce development, natural resource conservation, and quality of life. **Role:** assist and support the City in their redevelopment efforts by offering guidance in the pursuit of any local, State, and Federal funding opportunities for their brownfields sites.

ii. Letters of Commitment

The Letters of Support from each of our Community Partners are available in Attachment 3. Each of our Community Partners will contribute in-kind Community Outreach and resource sharing for the proposed project, as described in their letters of commitment.

4. PROJECT BENEFITS:

a. Health and/or Welfare and Environment

i. Health and/or Welfare Benefits

If the City of Sterling is awarded this assessment grant funding, there is an assurance that environmentally contaminated properties within the Downtown Corridor (as identified in the Community Need section) target area and throughout the rest of the City will be assessed within the next three years, reducing and/or eliminating the existing threat to human health and the environment that current exists. The first critical step in the redevelopment of brownfield properties is to stop the community's exposure to contaminants (Petroleum, Lead, Asbestos, VOCs, PCBs, as per Table 2), and if this funding is awarded, the City of Sterling will be able to do just that. As it was discussed in the Community Need section of this proposal, the priority sites that have been identified by the City are located in close proximity to residential neighborhoods, specifically the neighborhoods consisting of sensitive populations which include minorities, lower-income residents, and households living below the poverty level. The assessment and remediation of these sites will eliminate the paths of exposure that these residents may have to these contaminated properties, including the inhalation and ingestion of particulates and vapors, and direct physical contact with the contaminants. There is a strong connection between brownfields cleanup and improved water quality. By cleaning up these environmentally impaired sites, we remove both surface threats (everything from drums of hazardous materials to buildings contaminated with hazardous substances) and subsurface threats (contaminated soils and groundwater) which, if left unchecked, would affect both surface water bodies (Rock River) and aquifers. Assessing brownfield sites in Sterling will pave the way for these sites to be redeveloped, providing for a more productive end-use for these properties, subsequently reducing the number of vacant and under-used commercial and industrial properties in the City. Providing developable land will meet the needs and goals identified in the Community Need section: promote reinvestment and development/redevelopment along the riverfront; establish a unique character for the downtown and riverfront areas; promote job creation;

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provide more affordable housing; implement sustainable growth management; enhance recreational opportunities; address contamination from potential brownfield sites that are directly impacting the health and safety of the City's residents and bring them back to a more productive end-use.

ii. Environmental Benefits

Parks and open space are important components of an area and provide numerous functions and benefits. During Sterling's Downtown Riverfront Redevelopment Plan's community outreach process, a desire for a continuous trail system and recreational amenities was expressed by the residents and stakeholders. A riverwalk is a planned component of Riverfront Redevelopment Plan. The Sterling community has expressed a desire for a publicly accessible riverfront that is complemented by gathering places and recreational opportunities. The Rock River is a unique natural feature that helps define the character of the Riverfront area. Incorporating additional park and open space can help reinforce the distinctiveness of the area and attract additional visitors. The Whiteside County Greenways & Trails Plan proposes a riverfront trail on the south side of the river, near the downtown. A trail along Sterling's riverfront area would create the potential to establish a full circuit of dedicated trails and walkways on both sides of the Rock River as it passes through Sterling and nearby Rock Falls. Open and green spaces are needs that makeup significant parts of the mixed-use concept plan that has been developed for the riverfront properties. To protect public health during the assessment activities proposed by this grant proposal, the City of Sterling plans to provide notice to neighborhood residents prior to the commencement of any activities that may have an impact on public health. These activities might include, but are not limited to, drilling or soil removal that may allow for airborne contaminants to be ingested or inhaled. The City of Sterling will ensure that access to the site will be prohibited during assessment activities. A Health and Safety Plan (HASP) will be completed for the site where any intrusive sampling will occur. As specified in the HASP, when subsurface samples are collected or hazardous building materials are disturbed, the release of particulates and vapors will be monitored and controlled. The assessment data generated will be used to help the City and/or a developer determine how to protect the community during redevelopment activities. By using these Site-Specific Assessment Grant funds to determine the extent of contamination and following through with remediation and engineering/institutional controls, threats to human health will be identified and controlled throughout the process.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. Planning, Policies, and Other Tools

Sterling has long promoted economic prosperity, social and community well-being, and environmental stewardship. As a proactive Community, the City of Sterling made a point to implement brownfields and sustainability into their planning documents, ensuring that decision making processes and programs would incorporate the principles of sustainability into any future growth. Examples of the City's proactivity in regards to sustainability and their planning documents include:

- The Downtown Riverfront Redevelopment Plan reads as follows:
 - Cleaning up environmental contamination on redevelopment sites is a priority to be addressed before redevelopment can occur
 - Connectivity between the Downtown and Riverfront needs to be addressed
 - Replace vacant and deteriorating structures with new uses that attract residential users of the
- The City's Comprehensive Plan has listed the following as goals:
 - Encourage rehabilitation, redevelopment, and infill development of older areas in the Downtown in a manner which respect's Sterling's character, is compatible with surrounding uses, and improves overall appearance
 - Continue enhancement of the Rock River, especially enhancing access and recreational/open spaces along the river corridor
 - Aggressively work to cleanup environmentally contaminated sites within the City

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ii. Integrating Equitable Development or Livability Principles

The City of Sterling's Brownfields Program embodies the Livability Principles of a) providing more transportation choices; b) promoting equitable, affordable housing; c) increasing economic competitiveness; d) supporting existing communities; e) leveraging federal investment; and f) valuing communities and neighborhoods. Equitable, affordable housing development is a redevelopment goal at both of the City's priority sites. Increasing economic competitiveness has been an overall goal of the City of Sterling for quite some time, but especially now that flagging local manufacturing economy has caused Sterling to be designated a federally designated Empowerment/Enterprise Community. The Department of Housing & Urban Development created Empowerment/Enterprise communities with the intention to reduce unemployment and generate economic growth through the designation of Federal tax incentives and award of grants to distressed communities. With the creation and implementation of their planning documents, with an emphasis on sustainability, one of the City's goals is clearly improving the overall quality of life for their residents and its community.

c. Economic and Community Benefits

i. Economic or Non-Economic Benefits

The expected economic benefits of assessing the Downtown Corridor are substantial. Redeveloped properties improve property values, provide more housing options, and expand the tax base. The primary economic benefit of assessing sites through this program will be the resulting job creation and expansion of the City's tax base both from the future redeveloped brownfield site itself and positively affected surrounding areas. According to the Downtown Riverfront Redevelopment Plan, the planned end-use of the riverfront properties are for mixed-use facilities. The infusion of jobs due to the redevelopment of these sites will help to bolster a depressed local job market and provide a catalyst for the local economy. More specific economic impacts from this project include: job creation, capital investment, increased tax base, and a more diversified economy. To prevent future brownfields the City will use the approaches of code enforcement, property owner education, and business retention. The City is seriously considering local ordinances for closed-down facilities where building owners would be required to maintain the buildings to City standards. Sterling has found that when roofs, heating, plumbing, electric, and other systems begin to fail, the buildings and their value quickly degrade. To prevent current industrial sites from being vacated, thus creating new brownfields, Sterling will proactively retain existing viable industrial businesses by partnering with Greater Sterling Economic Development Corporation, one of our Community Partners, who will help connect these businesses with a network of business development and retention services in our City to help keep quality jobs in Sterling.

ii. Job Creation Potential

To date, there have been no EPA Job Training Grants awarded to any northern Illinois entity aside from Chicago. However, the City of Sterling will work with their local Illinois Local Workforce Investment Area Office to prepare area residents for the jobs that are created on sites assessed with these grant funds. The Illinois Local Workforce Investment Area Office will work to prepare participants for jobs suited to the Decatur economy, including green jobs, local food production, environmental field work jobs, and manufacturing jobs. In addition, the Local Workforce Investment office will provide unemployed people with jobs skills and soft skills for continued employment once they get hired.

5. PROGRAMMATIC CAPABILITY & PAST PERFORMANCES:

a. Programmatic Capability

The City of Sterling has the requisite ability and capacity to manage this Assessment grant. If awarded this funding, the City of Sterling will effectively manage the grant and successfully perform each phase of work on the project. City Manager Scott Shumard will serve as the City's Project Manager for this project, serving as the City's primary contact and responsible for submitting quarterly reports, financial reports, progress reports, and the final summary report to EPA Region 5 Staff with the assistance of the City's environmental consultant. As the Project Manager, Mr. Shumard will also be responsible for the coordination of grant work with the City's Environmental Consultant, all appropriate governmental bodies, all community partners, the public, and all other stakeholders involved in these grant related activities. Mr. Shumard is now serving in his 6th year with the City of Sterling and is very committed to

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the City's brownfields program. As the City Manager, he oversees a division charged with administering the planning, sustainability, neighborhood program, neighborhood and building inspection functions of the City, and with managing economic and urban development efforts. As the City Manager, he is part of an executive team that manages the day-to-day operations for a municipal government of more than 15,000 residents with an annual budget of approximately \$10 million. The City will procure a brownfields consultant that has a proven track record with programmatic reporting with EPA Brownfields grants. The City will adhere to their work plan, schedule, and all terms and conditions required by US EPA. The selected environmental consultant will work closely with IEPA and the assigned US EPA Grant Manager to oversee and approve environmental activities. The City of Sterling will follow all federal procurement procedures when hiring a brownfields consultant. The City has had some reporting issues in the past, particularly with quarterly reports and most recently DBE reporting has been an issue. The City's former environmental consultant, the source of the reporting issues, does not work with the City any longer. These reporting deficiencies have been addressed with EPA with assistance from Sterling's current brownfields consultant. Sterling understands the importance of identifying the outcomes and outputs that our Brownfield Project will achieve. Sterling will demonstrate to U.S. EPA the important outcomes and outputs of our Brownfield Project by updating the ACRES System quarterly with progress made.

b. Audit Findings

The City of Sterling has not received adverse audit findings from an OMB Circular A-133 Audit, or from any audit conducted by a federal, state, or local government.

c. Past Performances & Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant

1. Compliance with Requirements

The City of Sterling has received three previous US EPA Brownfields Assessment Grants, so they are very aware of the programmatic requirements involved in successfully managing an EPA Brownfields grant. The City will pay strict attention to the workplan and comply with the schedule, terms and conditions, and reporting requirements to include quarterly reports, federal financial reports, ACRES, DBE reports, and where appropriate, HASP and QAPP, and Analysis of Brownfield Cleanup Alternative (ABCA) reports. The City has a positive reputation with US EPA, ensuring to adhere to all requirements to protect the excellent reputation established with its federal partners.

2. Accomplishments

The City of Sterling has received three previous US EPA Brownfields Assessment Grants. In 2003, the City of Sterling was selected to receive assessment and revolving loan fund grants. At that time, the City was focusing on the 700-acre Rock River Redevelopment Area or the Northwestern Steel & Wire site, which is part of a designated Illinois Enterprise Zone. The City received \$400,000 in assessment grant funds, and \$800,000 in Revolving Loan Funds. In 2006, the City of Sterling received assessment and cleanup funds, obtaining \$257,000 in assessment funds and \$189,000 in petroleum cleanup funds for the Stormwater Retention Area within the former Northwestern Steel & Wire property. Assessment and remediation activities at the sites have now been completed. To date, all of the City's previous grant funding was allocated to the Rock River Redevelopment Area/Northwestern Steel & Wire site. Comprised of 700 acres, all of the City's previous grant resources were exhausted at this specific site due to its sheer size. Approximately 250 acres of the property is back in use, hosting Sterling Steel Co., Rock River Lumber & Grain, Sterling Rail Services, and a freight car repair shop. Together, these businesses employ over 200 people. By putting these sites back into reuse and pursuing additional US EPA Brownfields grant funding, the City is moving forward with the plans that have been laid out for their Downtown Riverfront Redevelopment Plan.

Appendix 3

Assessment Other Factors Checklist

Name of Applicant: City of Sterling, Illinois

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less.	
	Federally recognized Indian tribe.	
	United States territory.	
	Applicant will assist a Tribe or territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
	Targeted brownfield sites are contaminated with controlled substances.	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	
X	Project is primarily focusing on Phase II assessments.	5-9
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	9-10
X	Community experienced manufacturing plant/power plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant/power plant closures due to bankruptcy or economic disruptions.	1,2,4,5
	Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant/power plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to	

	EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.	
	Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, applicant must attach documentation which demonstrates this current designation.	
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	
	Applicant is a HUD Promise Zone community. To be considered, applicant must attach documentation.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

ATTACHMENT 1:

Threshold Documentation

**CITY OF STERLING, ILLINOIS
US EPA COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT**

THRESHOLD CRITERIA

1. Applicant Eligibility: The City of Sterling is an incorporated municipality of the State of Illinois and has the authority to enter into a cooperative agreement with the United States Environmental Protection Agency.

2. Letter from State Environmental Authority: The City of Sterling has received a letter of acknowledgement from the Illinois Environmental Protection Agency. (Please see Attachment 2: Letter of Acknowledgement from IEPA)

3. Community Involvement:

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfield Program's success. Communication is a two-way process, so our ultimate goal is to keep the community informed and involved so they remain aware of our potential concerns, questions, and solutions.

The City of Sterling has been engaging its residents and stakeholders in their Brownfields Program since its inception in 2003. The City has maintained this community engagement over the last decade by reconvening their Brownfields Redevelopment Advisory Committee and being very open and transparent about their pursuit of additional brownfields funding as well. These communication efforts by the City has brought together residents, visionaries, community groups, government entities, and private and nonprofit organizations to marshal financial and intellectual resources to forward the causes of economic development, recreation, tourism, habitat, transportation, and cleanup within the Downtown Corridor. The City made their pursuit of more recent Brownfields funding public in the summer of 2011. When the 2011 submittal, and the subsequent proposals, were not funded, the City maintained their open communication with the community. The City of Sterling will continue to include the affected neighborhoods and their respective residents, property owners, and business owners as vital partners in our assessment, cleanup, and/or reuse plans by holding public meetings and asking for input on site prioritization and redevelopment planning efforts. Neighborhood organizations and citizen's groups will have the opportunity to express their concerns, identify their needs, and create and implement redevelopment plans.

If these grants funds are awarded, we will hold a two-week public comment period on our draft work plan and announce the availability of the plan through a press release to local media. The City of Sterling has partnered with the Greater Sterling Development Corporation, Sterling Main Street, and the Sterling Park District to assist with community notification efforts through their respective organizations. For any cleanup planning activities funded by this grant, the City will seek the community's input into cleanup and redevelopment decisions by presenting information regarding the proposed cleanup and reuse plans at one or more community meetings in collaboration with their appropriate Community Partners. Due to the City's heavy Hispanic population, translation

CITY OF STERLING, ILLINOIS
US EPA COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT

services are available through the City and via social media postings, so we will accommodate any non-English speaking residents/stakeholders, etc. when it is appropriate.

As the City moves forward with the planned assessment activities, the City will develop fact sheets on the status of brownfields assessment activities at important junctures. They will post these fact sheets on their webpage, at City Hall, and will utilize any necessary social media to notify the public of any activity with a direct link to the City's webpage. Once the Brownfield Assessment activities commence, the City will be sure to remain in regular, transparent communication with their residents and stakeholders. Since our proposal is community-wide, the focus of our notification program will be on the City as a whole, but with particular emphasis on the Downtown Corridor. The appropriate notification methods that Sterling will utilize include newspaper articles, web publishing/posting, social media postings, and City Council meetings. In addition, our Community Partners will play vital roles in the community outreach efforts, directly notifying their organizations as well as other civic and social groups to ensure the widest reach. If the City is awarded this grant funding, they will continue with the utilization of diverse notification methods to ensure that they reach a broad audience. The City of Sterling has a significant Hispanic population, so the City will need to translate the community notification information into Spanish. In addition, the City of Sterling will seek out translation services for any households directly impacted by any assessment work. For any cleanup planning activities funded by this grant, the City will seek the community's input into cleanup and reuse decisions by presenting information regarding the proposed cleanup and reuse plans at community meetings in collaboration with their Community Partners.

More detailed information on our Community Involvement Plan can be found in the Narrative Proposal, under Ranking Criteria 3: Community Engagement & Partnerships, a) Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress, which is on Page 10.

4. Site Eligibility and Property Ownership Eligibility: Not Applicable. This Proposal is for a Community-Wide Assessment Grant. An eligibility determination matrix will be submitted for each of the sites selected for assessment upon the award of this Community-Wide Assessment Grant.

ATTACHMENT 2:

Letter from State Environmental Authority



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

December 9, 2014

City of Sterling
Attn: The Honorable Skip Lee, Mayor
212 Third Avenue
Sterling, IL 61081

Dear Mayor Lee:

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Brownfields Assessment Grant application to U.S. EPA. The City of Sterling is applying for \$400,000 in Brownfields Assessment Grant funding for both hazardous substances and petroleum contamination to conduct community-wide assessment activities.

If the City of Sterling identifies properties in the target area(s) potentially contaminated with petroleum, it will seek an eligibility determination from Illinois EPA before conducting site-specific assessments.

Illinois EPA acknowledges the City of Sterling's efforts to obtain federal Brownfields funds for this project. If you have any questions, please contact Mike Charles of my staff at (217) 785-3846 or by email at mike.charles@illinois.gov.

Sincerely,

Steve Colantino ^{by M.C.}

Steve Colantino, Manager
Office of Brownfields Assistance

c: Brad Bradley – U.S. EPA Region 5
Romona Smith – U.S. EPA Region 5

ATTACHMENT 3:

Community Partner Letters



December 15, 2014

Mayor Lee
City of Sterling
212 Third Avenue
Sterling, Illinois 61081

RE: Community Partner for City of Sterling's Brownfields Program

Dear Mayor Lee:

Sterling Main Street unites individuals, organizations, businesses and local government to support a revitalized, historic downtown through a comprehensive approach focusing on community assets and partnerships to develop, maintain and promote an attractive and vital downtown environment. Located in the downtown target area of Sterling's application, Sterling Main Street is keenly aware of the detriment that brownfield sites can pose to the City's redevelopment and economic efforts. The existence of abandoned/underutilized properties and the possible environmental contamination within can deter the redevelopment of these valuable sites.

In support of the City of Sterling's Brownfields Program, Sterling Main Street pledges our service and full cooperation as a Community Partner to help the City reach their redevelopment goals. **As a Community Partner, Sterling Main Street will utilize their four-point approach to downtown revitalization (organization, design, promotion, and economic restructuring) to help the City revigorate downtown development. Sterling Main Street will also serve as vital component of the City's Brownfields Redevelopment Advisory Committee (BRAC).**

We are honored to help the City continue this important work. Sterling Main Street commends the dedicated effort that the City of Sterling has made to redevelop brownfield sites. With a strong Brownfields Program in place, environmentally-related redevelopment issues are confronted and the groundwork is laid for community improvement and growth, specifically in the City's downtown.

Sincerely,

Janna Groharing, Executive Director
Sterling Main Street

Brian Grummert
President, Board of Directors





1741 Industrial Dr
Sterling IL 61081
p: 815.625.5255 | f: 815.625.5094
www.sterlingdevelopment.org

December 15, 2014

Mayor Lee
City of Sterling
212 Third Avenue
Sterling, Illinois 61081

RE: Community Partner for City of Sterling's Brownfields Program

Dear Mayor Lee:

The Greater Sterling Development Corporation is responsible for business attraction, expansion, and retention in Sterling. The Greater Sterling Development Corporation is keenly aware of the detriment that brownfield sites can pose to the City's redevelopment and economic efforts, particularly throughout the downtown and along the riverfront. The existence of abandoned/underutilized properties and the possible environmental contamination within can deter the sale and redevelopment of these valuable sites.

In support of the City of Sterling's Brownfields Program, the Greater Sterling Development Corporation pledges our service and full cooperation as a Community Partner to help the City reach their redevelopment goals. **As a Community Partner, the Greater Sterling Development Corporation will help the City leverage their financial resources to provide redevelopment incentives to new and existing businesses that will utilize these brownfield sites, with special emphasis on the development of riverfront properties.** The Greater Sterling Development Corporation can work with the City and redevelopers to provide resources from existing TIF Districts, Enterprise Zones, Revolving Loan Funds, and much more.

The Greater Sterling Development Corporation is proud of the dedicated effort that the City of Sterling has made to redevelop brownfield sites. With a strong Brownfields Program in place, environmentally-related redevelopment issues are confronted and the groundwork is laid for community improvement and growth. We are honored to help the City continue this important work.

Sincerely,

A handwritten signature in dark ink, appearing to read "Heather Sotelo", is written over a horizontal line.

Heather Sotelo
Executive Director



P.O. Box 958
Sterling, IL 61081

December 15, 2014

Mayor Lee
City of Sterling
212 Third Avenue
Sterling, Illinois 61081

RE: Community Partner for City of Sterling's Brownfields Program

Dear Mayor Lee:

The Sterling Park District is proud of the dedicated effort that the City of Sterling has made to redevelop brownfield sites within the City. With their brownfield redevelopment efforts, the City is adhering to the principles of the City's Comprehensive Plan and Riverfront Redevelopment Plan, making quality of life a priority.

Enhancing the quality of life for the residents of the City of Sterling is a principle that the Sterling Park District can support, as we work to enrich the community and its economic viability by providing outstanding parks, programs, facilities, and recreational opportunities.

In support of the City of Sterling's Brownfields Program, the Sterling Park District pledges our service and full cooperation as a Community Partner to help the City reach their brownfield redevelopment goals. **As a Community Partner, the Sterling Park District will provide a continued focus on sustainability for the City, working to help create more greenspace and recreational opportunities as an end-use for redeveloped brownfield sites, with particular emphasis on the downtown and along the riverfront properties. In addition, the Sterling Park District will do its part to assist the City with the maintenance of any newly created greenspace to ensure long-lasting enjoyment by the City's residents.**

With a strong Brownfields Program in place, environmentally-related redevelopment issues are confronted and the groundwork is laid for community improvement and growth. We are proud to help the City continue this important work.

Sincerely,

A handwritten signature in cursive script, reading "Larry Schuldt". The signature is written in dark ink and is positioned above the printed name.

Larry Schuldt, Executive Director
Sterling Park District

BLACKHAWK HILLS
Regional Council



Jo Daviess • Stephenson • Carroll • Ogle • Whiteside • Lee

December 15, 2014

Mayor Lee
City of Sterling
212 Third Avenue
Sterling, Illinois 61081

RE: Community Partner for City of Sterling's Brownfields Program

Dear Mayor Lee:

Economic development consists of concentrated and sustained efforts by communities to develop policies that promote improved standard of living and economic health in a specific region. These efforts can include, but are not limited to, infrastructure improvements, environmental sustainability, and health and safety.

The mission of Blackhawk Hills Regional Council is to assist the people and local agencies of northwest Illinois in developing and implementing a regional outlook that will enhance economic growth, workforce development, natural resource conservation, and quality of life for local communities through leadership, program and project development, planning, and leveraging of resources. Blackhawk Hills is keenly aware of the detriment that brownfield sites can pose to a community's redevelopment and economic efforts, particularly throughout their downtowns and along their riverfront properties. The existence of abandoned/underutilized properties and the possible environmental contamination within can deter the sale and redevelopment of these valuable sites.

In support of the City of Sterling's Brownfields Program, the Blackhawk Hills Regional Council pledges our service and full cooperation as a Community Partner to help the City reach their redevelopment goals. **As a Community Partner, Blackhawk Hills will assist and support the City in their redevelopment efforts by offering guidance in the pursuit of any local, State, and Federal funding opportunities for their brownfields sites.**

We look forward to a successful partnership.

Sincerely,

Theresa Wittenauer, Executive Director
Blackhawk Hills Regional Council

ATTACHMENT 4:

Leveraged Funds Documentation



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

(217) 524-1663

December 10, 2014

Mayor Skip Lee
City of Sterling
212 Third Street
Sterling, IL 61081

Dear Mayor Lee:

In 2013, Illinois EPA helped facilitate a U.S. EPA funded time-critical removal action at the Lawrence Hardware building in downtown Sterling. The removal action greatly diminished the risk to human health and the nearby Rock River by removing hazardous chemicals. Since that time, it is our understanding that the City of Sterling has applied for a U.S. EPA Community Wide Assessment Grant that would include the Lawrence Hardware site and other properties throughout Sterling. If the city is successful in receiving this grant, they would be able to conduct assessment activities that would promote future redevelopment.

Upon request, Illinois EPA's Office of Site Evaluation can provide assistance to the city with Phase II investigative activities. The activities will provide the necessary personnel to collect sub-surface soil borings, collect groundwater data, operate specific field equipment, and utilize laboratory services at no cost to the City of Sterling. The data generated during the Phase II investigation can then be used to assist the city and their consultants toward the goal of obtaining a no further action for the Lawrence Hardware site or any other identified property.

Historically, Illinois EPA's Office of Site Evaluation has provided assistance to the city on several projects. We look forward for the opportunity to continue this strong partnership with the City of Sterling. If you have any questions or would like to discuss future assistance from our program, please contact me at the above number.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Everettts", with a stylized flourish at the end.

Bruce Everettts
Office of Site Evaluation
Division of Remediation Management
Bureau of Land